

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:)	BANKRUPTCY CASE NO.: 19-12703
)	
BETTYE TYUS)	CHAPTER 13 PROCEEDING
)	
DEBTOR)	JUDGE JESSICA E. PRICE SMITH
)	
)	<u>MOTION TO DISMISS CASE</u>
)	<u>PURSUANT TO 11 USC § 1307(b)</u>

Now comes the Debtor, Bettye Tyus, by and through counsel, and, pursuant to 11 U.S.C. § 1307(b), respectfully requests that this Court issue an Order Dismissing her case. .

For cause Debtor states that she is unable to continue to fund a Chapter 13 Plan and seeks Dismissal.

WHEREFORE, Debtor prays this Motion is granted.

Respectfully Submitted,

AMOURGIS & ASSOCIATES, LLC

/s/ Charles W. Fonda
Charles W. Fonda (0022753)
3200 West Market Street, Suite 106
Akron, Ohio 44333
Phone: (330) 436-5210
Fax: (330) 436-5230
Email: jdoran@amourgis.com
Attorney for Debtor

CERTIFICATE OF SERVICE

I certify that on June 28, 2019 the foregoing document was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Charles W. Fonda on behalf of Debtor at charlesf@amourgis.com;

Lauren A. Helbling, on behalf of Chapter 13 Trustee's office at ch13trustee@ch13cleve.com,
lhelbling13@ecf.epiqsystems.com

Cleveland Office of the United States Trustee, on behalf of Daniel M. McDermott, United States Trustee, at the registered address of the US Trustee @ USDOJ.gov established with the bankruptcy court.

And by regular U.S. mail, postage prepaid, on:

Bettye J. Tyus
4175 East 147th St.
Cleveland, OH 44128

All Creditors Per Attached List.

/s/ Charles W. Fonda
Charles W. Fonda (0022753)
Attorney for Debtor

Amerassist A/R Solutions
P.O. Box 26095
Columbus, OH 43226

Andrew C Liu D.O PH.D
20050 Harvard Avenue #308
Warrensville Heights, OH 44122

Autauga County
Attn: Officer or Agent
Kathy Evans, Revenue Commissioner
135 N. Court St. Suite D
Prattville, AL 36067

Bank Of America
Attn: Bankruptcy
Po Box 982238
El Paso, TX 79998

Brinks Money
Po Box 149016
Austin, TX 78714

City of Cleveland
Division of Assessments & Licenses
601 Lakeside Ave. rm 320
Cleveland, OH 44114

Cleveland EMS
601 Lakeside Ave., Room 127
Cleveland, OH 44114

Cleveland Urology Associates, Inc.
P.O. Box 74008884
Chicago, IL 60674

Clinical Medical Services Company
P.O. Box 92237
Cleveland, OH 44193

Cuyahoga County Treasurer
ATTN: Officer or Agent
2079 East 9th Street
Cleveland, OH 44115

Cuyahoga County Treasurer
PO Box 94404
Cleveland, OH 44101-4404

First Federal Credit Control
Attn: Bankruptcy
24700 Chagrin Blvd, Ste 205
Cleveland, OH 44122

HDIS
9385 Dielman Industrial Dr
Olivette, MO 63132

ID Consultats Inc
P.O. Box 901901
Cleveland, OH 44190

JP Recover Services, Inc.
P.O. Box 16749
Rocky River, OH 44116

Magnetic Springs Water Company
Po Box 132076
Columbus, OH 43218

MDINR LLC
Po Box 105750
Atlanta, GA 30348

Mobilex
Po Box 17452
Baltimore, MD 21297

Physicians Ambulance Service Inc
4495 Cranwood Pkwy
Cleveland, OH 44128-4003

PNC Bank
Attn: Officer or Agent
249 Fifth Avenue
One PNC Plaza
Pittsburgh, PA 15222

The Avenue Care and Rehabilitation
4120 Interchange Corporate Ctr Rd
Warrensville Heights, OH 44128

The Lillian and Betty Ratner School
27575 Shaker Blvd
Pepper Pike, OH 44124

Wellfount Pharmacy
5751 W 73rd St
Indianapolis, IN 46278

Yale R Levy
4645 Executive Drive
Columbus, OH 43220